



Shenoa Payne <spayne@paynelawpdx.com>

Re: Pitkin - BON complaints [IWOV-pdx.FID3663076]

John Coletti <john@paulsoncoletti.com>
 To: "Hansen, Richard" <RHansen@schwabe.com>
 Cc: "Tim Jones (tim@timjonespc.com)" <tim@timjonespc.com>, "Talcott, Anne" <ATalcott@schwabe.com>, Shenoa Payne <spayne@paynelawpdx.com>

Thu, Oct 19, 2017 at 5:47 PM

We will go ahead file the motion tomorrow on both issues and if you're position on producing the depos changes you can let me know.

I will be taking her depo. Can you remind me what all she has been designated for other than the contract? Thanks.

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On Oct 19, 2017, at 5:39 PM, Hansen, Richard <RHansen@SCHWABE.com> wrote:

John,

I am going to have to continue Corizon's objection to producing its submissions to the Oregon BON. Investigations by the Board are confidential. As is the identity of the complainant. Layer that on the policy reasons and I just cannot agree to produce the documents you have requested related to the Board of Nursing.

As I mentioned last night, I will get to you on the issue of the *Green* transcripts after I speak with my client tomorrow.

Who is going to be taking Debbie Fye's deposition next week?

Dick

Richard K. Hansen | Shareholder

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